

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

CHRISTOPHER STEELE
a/k/a "Mike Dozer"

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CRIM 14-110

FILED

SEP 11 2014

MICHAEL E. KUNZ, Clerk
By _____ Dep. Clerk

DEFENDANT'S MOTION FOR BAIL PRIOR TO TRIAL

Defendant, Christopher Steele, has been accused a number of charges in the Commonwealth of Pennsylvania and recently, the United States charged Mr. Steele in a federal indictment with two sections of what is known as the Mann Act as well possession of child pornography.

The Defendant is seeking reasonable cash bail and avers that he poses no risk of flight and no danger to the community.

THE FACTS:

In October 2013, the parents of the alleged victim discovered that their son, aged 14, had been communicating with adult males over the internet through a variety of social network applications designed for mobile phones. The parents of the alleged victim contacted the police who began an investigation in Montgomery County, Pennsylvania. The alleged victim texted, chatted and otherwise communicated with dozens of men over these applications. It is alleged he met the defendant, Christopher Steele, and began an online relationship with him. It should be noted that in the course of an investigation into potential illicit contacts between the alleged victim and adult men, it was discovered that the alleged victim and other minors had installed video equipment at the boys shower at the alleged victim's school and had been transmitted video of the showers to adult men on the internet.

In December 2013, the defendant, Christopher Steele was arrested in his home state of Delaware by the New Castle County Police who were assisting the Montgomery County, Pennsylvania police in arresting suspects they had developed in the course of their investigation.

THE EVIDENCE

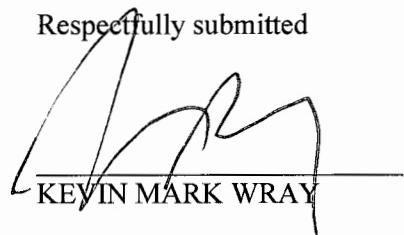
Counsel for the defendant was just given evidence from the Montgomery County matter. In addition, Defense Counsel continues to receive discovery from the US Government.

DEFENDANT'S BACKGROUND

Mr. Steele was born and raised in Northern Delaware. He has never resided, attended school or been employed in any regular basis outside of a 35 mile radius of his parents' home in Newark, Delaware. Mr. Steele is 33 years old and has no criminal record. While Mr. Steele has been working as an adult film actor since approximately May 2013, Mr. Steele has been employed full time for an extermination business. Mr. Steele has surrendered his passport to his counsel and will abide by all travel restrictions placed on him.

WHEREFORE, the defendant respectfully requests he be granted reasonable bail.

Respectfully submitted

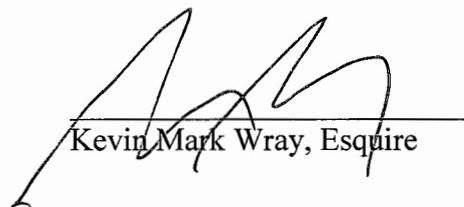


KEVIN MARK WRAY

VERIFICATION

I, Kevin Mark Wray, attorney for the defendant in this matter, hereby verify that the statements made in the foregoing Motion/Petition are true and correct to the best of my knowledge, information or belief. The undersigned understands that false statements herein are made subject to the penalties of 18 USC §2706, relating to penalty of perjury.

Date: 9/3



Kevin Mark Wray, Esquire

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : Criminal No.: 14-110-(8)

v. :

CHRISTOPHER STEELE :

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document upon the person in the manner indicated below, which service satisfies the requirement of the Federal Rules of Criminal Procedure.

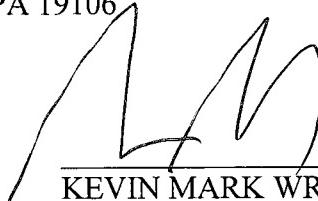
Service by hand delivery or first-class U.S. mail addressed to:

US Attorney's Office
Eastern District of Pennsylvania
615 Chestnut St
Philadelphia, PA 19106

Michael Kunz, Clerk of Courts
US District Court for Eastern District of Pennsylvania
601 Market Street
Philadelphia, PA 19106

9/8

Date


KEVIN MARK WRAY, ESQ.
Attorney for Defendant